1 2 3 4 5	Eric B. Myers, SBN 8588 McCRACKEN, STEMERMAN & HOLSBERRY, LLP 1630 South Commerce Street, Suite 1-A Las Vegas, NV 89102 Tel: (702)386-5107 Fax: (702)386-9848 E-mail: ebm@msh.law		
6 7	Attorneys for Defendant Teamsters, Chauffeurs, Warehousemen and Helpers, Local Union No. 631		
8			
9	UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA		
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11			
12	WILLIAM N. COVELL, JR.,	Case No. 2:20-cv-01058-RFB-NJK	
13 14	Plaintiff,		
15	v.	STIPULATED MOTION FOR EXTENSION	
16 17 18 19	FREEMAN EXPOSITIONS. LLC d/b/a FREEMAN, a Foreign Limited Liability Company; TEAMSTERS, CHAUFFEURS, WAREHOUSEMEN AND HELPERS, LOCAL UNION NO. 631; DOES I through X, inclusive;	OF TIME FOR DEFENDANT TEAMSTERS, CHAUFFEURS, WAREHOUSEMEN AND HELPERS, LOCAL UNION 631 TO ANSWER OR RESPOND	
20	and ROE ENTITIES I through X; inclusive, Defendants.	(FIRST REQUEST)	
21 22 23		I	
24	Defendant Teamsters, Chauffeurs, Warehous	emen and Helpers, Local No. 631 ("Local 631")	
25	hereby files this stipulated motion for an extension of seven (7) days in which to file Local 631's		
26	answer or other responsive pleading to the complaint in this case. Local 631 was served with		
27	summons and complaint on June 26, 2020, making its answer due on July 17, 2020. By this extension,		
28	Local 631 shall have on and through July 24, 2020 to file its answer or other response. This extension		

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1	is not sought in order to delay, but to allow counsel to investigate the allegations and formulate a	
2	proper answer or response. A proposed order is attached.	
3	IT IS SO STIPULATED.	
4	Dated: July 14, 2020	Respectfully Submitted,
5		McCRACKEN, STEMERMAN & HOLSBERRY, LLP.
6		/s/Eric B. Myers
7		Eric B. Myers, SBN 8588
8		McCRACKEN, STEMERMAN & HOLSBERRY, LLP 1630 South Commerce Street, Suite 1-A Las Vegas, NV 89102
9		Tel: (702)386-5107
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11		E-man. come msn.iaw
12		Attorneys for Defendant Teamsters, Chauffeurs, Warehousemen and Helpers, Local Union 631
13		warenousemen and Helpers, Local Onion 051
14	Dated: July 14, 2020	LAW OFFICE OF VERNON L. BAILEY
15		/- Al
16		<u>/s/Vernon L. Bailey</u> VERNON L. BAILEY, ESQUIRE
17		Nevada Bar No. 9753
18		8430 W. Lake Mead Blvd., Suite I 00 Las Vegas, NV 89128
19		(702) 877-6444
		vbailey@vernonbaileylaw.com
20		Attorney for Plaintiff
21		
22		IT IS SO ORDERED.
23		Dated: July 15, 2020
24		· Ma
25		
26		Nancy J. Koppe\ United States Magistrate Judge
27		Cinica Ciaico Magioriato Gaago
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